

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

**JULIE SCHULTZ,**

Case No. 10-cv-4935

PLAINTIFF,

Hon. Ronald A. Guzman

v.

**GLOBAL CREDIT & COLLECTION CORP.,**

DEFENDANT.

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**UNOPPOSED MOTION FOR AN EXTENSION TO FILE  
ANSWER OR OTHER PLEADING**

Defendant, Global Credit & Collection Corp. (“Defendant”) respectfully moves this Court for an extension of time to answer and/or otherwise plead in the above-captioned action.

In support of this Motion, Defendant states as follows:

1. Defendant was served with the Complaint in this matter on or about August 6, 2010.
2. However, Defendant did not retain undersigned counsel until on or about August 25, 2010.
3. Defendant’s answer or otherwise pleading in response to Defendant’s Complaint is due on August 27, 2010.
4. Counsel needs additional time to formulate an answer or other pleading to Plaintiff’s Complaint.
5. Accordingly, for good cause shown, Defendant respectfully requests 21 days, up to and including September 17, 2010, to answer or otherwise plead in response to Plaintiff’s Complaint.

6. Defendant's counsel conferred with Plaintiff's counsel, and Plaintiff's counsel has no objection to the extension.

WHEREFORE, for the reasons stated above, which Defendant asserts constitute good cause, Defendant asks that this Court grant it an additional twenty-one (21) days, up to and including September 17, 2010, in order to file its answer or other pleading in response to Plaintiff's Complaint.

Respectfully submitted,

/s Stacie E. Barhorst  
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